

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

<b>NATIONAL RIFLE ASSOCIATION OF AMERICA,</b>	§	
<b>Plaintiff,</b>	§	
<b>v.</b>	§	
<b>ANDREW CUOMO, both individually and in his official capacity; MARIA T. VULLO, both individually and in her official capacity; and THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES,</b>	§	<b>CIVIL CASE NO. 18-CV-00566-TJM-CFH</b>
<b>Defendants.</b>	§	<b>NOTICE OF MOTION BY PLAINTIFF TO COMPEL THE PRODUCTION OF DOCUMENTS</b>

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure and upon the annexed Declaration of Michelle J. Martin in Support of Plaintiff’s Motion to Compel the Production of Documents (the “Motion”), dated August 27, 2020, and all attachments thereto, the accompanying memorandum of law, and all other papers and proceedings in this matter, Plaintiff National Rifle Association of America (the “NRA”), by their undersigned counsel of record, hereby moves this Court before the Honorable Christian F. Hummel, in the United States District Court, Northern District of New York, Albany, New York, for an order: (1) granting this Motion; (2) overruling Everytown’s objections; (3) requiring Everytown to produce all responsive documents within seven (7) days; (4) overruling all of Everytown’s asserted privileges; (5) requiring production of all documents withheld on the basis of any privilege; (6) awarding the NRA its reasonable attorneys’ fees and costs in bringing this motion; and (7) awarding the NRA all other appropriate relief. The Court held a telephone conference regarding the proposed motion on August 10, 2020. On August 11, 2020, the Court permitted the NRA to file the Motion by August 17, 2020 and directed that responses to the Motion be filed by September 7, 2020. (Dkt. No. 241). On August 19, 2019, the NRA sought a brief extension of its motion-to-compel deadline.

(Dkt. No. 248). The Court granted the NRA's request on August 20, 2020 and ordered that the motion to compel be filed by August 27, 2020, and set the response deadline for September 17, 2020, and reply deadline for September 28, 2020. (Dkt. No. 249).

Dated: August 27, 2020

Respectfully submitted,

By: /s/ Sarah B. Rogers

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**ATTORNEYS FOR THE NATIONAL RIFLE  
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**CERTIFICATE OF SERVICE**

I certify that on August 27, 2020, I caused the following: (1) Notice of Motion by Plaintiff to compel the production of documents; (2) Declaration of Michelle J. Martin in support of Plaintiff's Motion to Compel and accompanying exhibits; and (3) Memorandum of Law in support of Plaintiff's Motion to Compel the production of documents, to be served on the below counsel of record via the Court's electronic notification system in accordance with the Federal Rules of Civil Procedure:

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/s/ Sarah B. Rogers  
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